

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

MARY YOUNG,  
*Plaintiff,*

v.

TEXAS SOUTHERN UNIVERSITY,  
*Defendant.*

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Civil Action No. 4:23-cv-03888

**DECLARATION OF DARREN BARNETT**

I, Darren Barnett, have personal knowledge of all statements below. I hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Darren Barnett. I am at least 18 years old, of sound mind, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I am a sergeant with the TSU Police. I have served as a sergeant with TSU since July 5, 2017. I served on former President Lesia Crumpton-Young's security detail from the time she was hired by the University.

3. On July 30, 2025, in the office of my attorney, I conducted a search of my personal iCloud account for emails to, or from, Lesia Crumpton-Young at the email address [drumptonyoung@gmail.com](mailto:drumptonyoung@gmail.com). I found no results.

4. On July 30, 2025, in the office of my attorney, I conducted a search of my personal Google account for emails to, or from, Lesia Crumpton-Young at the email address [drumptonyoung@gmail.com](mailto:drumptonyoung@gmail.com). I found no results.

5. On July 30, 2025, in the office of my attorney, I conducted a search of my Xfinity device for emails to, or from, Lesia Crumpton-Young at [drumptonyoung@gmail.com](mailto:drumptonyoung@gmail.com). I found no results.

6. I have cellular phone service through AT&T only. I do not use or access an AT&T email account.


7. I have cellular service through Xfinity only for my Ipad. I do not use or access an Xfinity email account.

8. The only cellphone that I have in my possession or control is the Iphone 15 ProMax. I have no other phones. When I purchased my phone in or about August 2024, I requested that all of the data from my Iphone 10 be transferred to the new phone. To the best of my knowledge, that task was completed and my Iphone 13 was wiped clean. I believe that the data was successfully transferred because the information that I previously saw on my Iphone 13, was now on my Iphone 15 ProMax. The Iphone 13 was no longer of any use to me and I did not monitor what happened to it and have not seen it since I moved residences in August of 2024. I believe it was discarded in my relocation.

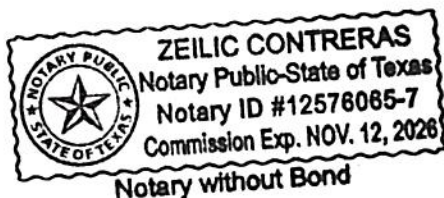
9. I have conducted a search of the personal accounts and devices within my possession and control. I did not omit or exclude any personal device or account when conducting the search for emails to [drcrumptonyoung@gmail.com](mailto:drcrumptonyoung@gmail.com).


My name is Darren Barnett. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, Texas on July 30, 2025.

  
Darren Barnett, Declarant

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, by Darren Barnett this  
30<sup>th</sup> day of July 2025, in Harris County, Texas.



  
Notary Public in and for  
The State of Texas